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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. JESSICA McLELLAN, Defendant.	No. CR 07-00173 SBA STIPULATED REQUEST FOR EARLY TERMINATION OF PROBATION AND ORDER
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The United States of America, by and through its counsel the United States Attorney, and defendant Jessica McLellan, by and through undersigned counsel of record, hereby stipulate and agree as follows:

1. Ms. McLellan pled guilty on October 23, 2006, to one count charging her with securities fraud in violation of 15 U.S.C. §§ 78j(b) & 78ff and 17 C.F.R. § 240.10b-5. United States District Court Judge Percy Anderson of the Central District of California sentenced Ms. McLellan primarily to three years of probation and 300 hours of community service. *See United States v. McLellan*, No. CR 03-00940-PA (C.D. Cal.),

1 Docket # 75. The case was transferred in May 2007 to this Court pursuant to 18 U.S.C.
2 § 3605. Docket # 1.

3 2. Since sentencing, Ms. McLellan has complied in all ways with the terms of her
4 probation, paid all applicable fines and fees, and completed more than 500 hours of
5 community service. Ms. McLellan's Probation Officer, Wayne Mirikitani, informs counsel
6 that the Probation Office has no objection to the early termination of Ms. McLellan's
7 probation.

8 3. Ms. McLellan's probationary status hampers her work. Ms. McLellan is seeking
9 employment that requires international travel, but foreign officials have at times denied
10 her access to their countries because of her probationary status. Ms. McLellan
11 understands that termination of her probationary status may aid in lifting these
12 restrictions.

13 4. Judge Anderson of the United States District Court for the Central District of
14 California has already granted early termination of probation to four defendants whose
15 convictions arose from the same scheme as Ms. McLellan's. *See United States v.*
16 *Kalina*, No. CR 03-0012-PA (C.D. Cal.) Docket # 59; *United States v. Chan*, No. CR 04-
17 1259-PA (C.D. Cal.) Docket # 45; *United States v. Patel*, No. CR 03-00940-PA (C.D.
18 Cal.) Docket # 78; *United States v. Infeld*, No. CR 04-1259-PA (C.D. Cal.) Docket # 31.

19 5. Wherefore, the undersigned parties request that Ms. McLellan's probation be
20 terminated.
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1 Respectfully submitted,

2 Dated: May 5, 2009

THOMAS O'BRIEN
United States Attorney for the Central District
of California

4 By: /s/
Michael R. Wilner
5 Assistant United States Attorney
Central District of California
6 Counsel for the United States of America

7 Dated: May 5, 2009

ARGUEDAS, CASSMAN & HEADLEY, LLP

8 By: /s/
9 Raphael M. Goldman
10 Counsel for Jessica McLellan

11 PURSUANT TO STIPULATION, it is SO ORDERED.

12 5/11/09

13 *Sandra B. Armstrong*
United States District Court Judge